

July 8, 2019

VIA ECF

Hon. Therese W. Dancks
United States Magistrate Judge
Federal Building and U.S. Courthouse
P.O. Box 7346
Syracuse, New York 13261

**Re: United States v. Waterbury, et al.
Civil Action No. 5:18-cv-440 (MAD/TWD)**

Dear Judge Dancks:

Pursuant to the Court's Order of July 2, 2019, Defendants write to provide a status update on settlement of the above-referenced matter.

Counsel for all parties have engaged in multiple telephone conferences to discuss the terms of the written consent decree. The parties have reviewed and reached agreement on the majority of the terms and provisions at this time, although a small number of terms and provisions remain outstanding.

The United States intends to provide Defendants with its most recent proposed changes to the Consent Decree by the end of today. The parties will then meet and confer in an effort to resolve the final terms and provisions that remain outstanding. Once those terms are finalized, the United States' attorneys will need to submit the Consent Order for review and approval to their superiors.

Therefore, the parties jointly request that they be permitted to submit a status update to the Court by July 15, 2019.

Very truly yours,

GOLDBERG SEGALLA LLP*John P. Coghlan*

John P. Coghlan

JPC:

cc: All Counsel, via ECF

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